

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13
: :
Sidney Freeman : No. 21-11947-MDC
Debtor : :

ANSWER TO MOTION OF Deutsche Bank National Trust Company, as
Indenture Trustee, for New Century Home Equity Loan Trust 2004-4
FOR RELIEF FROM THE AUTOMATIC STAY UNDER SECTION 362
AND CERTIFICATE OF SERVICE

1. Admitted.
2. Admitted.
3. Admitted.
- (Second) 3. Admitted.
4. Admitted.
5. No response necessary.
6. Denied for lack of knowledge.
7. Admitted.
8. Denied. Movant has rejected payments and the Debtor
has been forced to put the funds aside.
9. Denied. Movant's own actions caused the problem.
10. Admitted and Debtor has the funds and has been forced
to withhold the funds.
12. Denied.
13. No objection.
14. Debtor opposes the same since Movant's own actions
caused the problem.

WHEREFORE Debtor respectfully request this Honorable Court deny Movant's Motion for Relief.

/s/ David M. Offen
David M. Offen
Attorney for Debtor

Dated: 03/11/2022

A copy of this Answer is being served on Rebecca Ann Solarz, Esquire, and the Chapter 13 Trustee.